

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOHNNY B. DELASHAW, JR.,

Plaintiff,

v.

SEATTLE TIMES COMPANY, and  
CHARLES COBBS,

Defendants.

CASE NO. 2:18-cv-00537-JLR

AND ORDER  
STIPULATED MOTION EXTENDING  
INITIAL SCHEDULING DEADLINES

NOTE ON MOTION CALENDAR:  
MAY 14, 2018

Plaintiff Johnny B. Delashaw, Jr. ("Plaintiff") and Defendants Seattle Times Company ("Seattle Times") and Charles Cobbs ("Cobbs") (collectively, the "Parties"), jointly and respectfully request that the Court extend the current initial scheduling dates as set forth below.

Under the current schedule, the Parties are to conduct the FRCP 26(f) Conference by May 11, 2018, submit Initial Disclosures Pursuant to FRCP 26(a)(1) by May 25, 2018, and submit a Combined Joint Status Report and Discovery Plan as required by FRCP 26(f) and LCR 26(f) by June 1, 2018.

Defendant Seattle Times Company was served on April 10, 2018 and a Waiver of Service of Summons (Dkt. 3) was filed on April 12, 2018, allowing Defendant Seattle Times Company sixty (60) days to answer or file a motion under Rule 12. Defendant Charles Cobbs was served on April 10, 2018 and a Waiver of Service of Summons (Dkt. 9) was filed on April 30, 2018,

STIPULATED MOTION EXTENDING INITIAL  
SCHEDULING DEADLINES - 1  
CASE NO. 2:18-cv-00537-JLR

SUMMIT LAW GROUP PLLC  
315 FIFTH AVENUE SOUTH, SUITE 1000  
SEATTLE, WASHINGTON 98104-2682  
Telephone: (206) 676-7000  
Fax: (206) 676-7001

1 allowing Defendant Charles Cobbs sixty (60) days to answer or file a motion under Rule 12.  
2 Defendants' deadline to respond to the Complaint is June 10, 2018.

3 The Parties have agreed it would be more productive for them and the Court if the FRCP  
4 26(f) conference occurred, and the Initial Disclosures and Combined Joint Status Report and  
5 Discovery Plan were submitted, after the Defendants have had an opportunity to answer or  
6 otherwise respond to the Complaint. The Parties jointly request that these deadlines be revised as  
7 follows:

8 Deadline for FRCP 26(f) Conference: 6/18/2018

9 Initial Disclosures Pursuant to FRCP 26(a)(1): 7/2/2018

10 Combined Joint Status Report and Discovery  
11 Plan as Required by FRCP 26(f)  
and Local Civil Rule 26(f): 7/9/2018

12 The Parties agree that no prejudice will be incurred by either side, and judicial economy  
13 will be served, if this joint request is granted.

14 STIPULATED AND AGREED TO this 14<sup>th</sup> day of May, 2018.

15 HARRIGAN LEYH FARMER & THOMSEN  
16 LLP  
Attorneys for Plaintiff

17 By s/ Arthur W. Harrigan, Jr.  
18 Arthur W. Harrigan, Jr.  
Tyler L. Farmer  
19 Harrigan Leyh Farmer & Thomsen LLP  
999 Third Avenue, Ste. 4400  
20 Seattle, WA 98104  
Telephone: (206) 623-1700  
21 Email: arthurh@harriganleyh.com  
tylerf@harriganleyh.com  
22

SUMMIT LAW GROUP PLLC  
Attorneys for Defendant Seattle Times  
Company

By s/ Jessica L. Goldman  
Jessica L. Goldman, WSBA #21856  
Christopher T. Wion, WSBA #33207  
Teresa R. Rodela, Bar Number Pending  
Summit Law Group PLLC  
315 Fifth Avenue South, Suite 1000  
Seattle, WA 98104  
Telephone: (206) 676-7000  
Email: jessicag@summitlaw.com  
chrisw@summitlaw.com  
teresar@summitlaw.com

MCNAUL EBEL NAWROT & HELGREN  
PLLC

Attorneys for Defendant Charles Cobbs

By s/ Jehiel I. Baer

Malaika M. Eaton

Jehiel I. Baer

McNaul Ebel Nawrot & Helgren PLLC

600 University Street, Ste. 2700

Seattle, WA 98101

Telephone (206) 467-1816

Email: [meaton@mcnaul.com](mailto:meaton@mcnaul.com)

[jbaer@mcnaul.com](mailto:jbaer@mcnaul.com)

~~CONFIDENTIAL~~ ORDER

Based on the foregoing Stipulated Motion, the Court orders that the Stipulated Motion  
Extending Initial Scheduling Deadlines is GRANTED. The Initial Scheduling Dates are continued  
as follows:

Deadline for FRCP 26(f) Conference: 6/18/2018

Initial Disclosures Pursuant to FRCP 26(a)(1): 7/2/2018

Combined Joint Status Report and Discovery  
Plan as Required by FRCP 26(f)  
and Local Civil Rule 26(f): 7/9/2018

IT IS SO ORDERED.

Dated this 15th day of May, 2018.

  
THE HONORABLE JAMES L. ROBERT  
UNITED STATES DISTRICT COURT JUDGE

STIPULATED MOTION EXTENDING INITIAL  
SCHEDULING DEADLINES - 3  
CASE NO. 2:18-cv-00537-JLR

SUMMIT LAW GROUP PLLC  
315 FIFTH AVENUE SOUTH, SUITE 1000  
SEATTLE, WASHINGTON 98104-2682  
Telephone: (206) 676-7000  
Fax: (206) 676-7001

***Presented by:***

SUMMIT LAW GROUP PLLC  
Attorneys for Defendant Seattle Times Company

By s/ Jessica L. Goldman  
Jessica L. Goldman, WSBA #21856  
Christopher T. Wion, WSBA #33207  
Teresa R. Rodela, Bar Number Pending  
Summit Law Group PLLC  
315 Fifth Avenue South, Suite 1000  
Seattle, WA 98104  
Telephone: (206) 676-7000  
Email: [jessicag@summitlaw.com](mailto:jessicag@summitlaw.com)  
[chrisw@summitlaw.com](mailto:chrisw@summitlaw.com)  
[teresar@summitlaw.com](mailto:teresar@summitlaw.com)

HARRIGAN LEYH FARMER & THOMSEN LLP  
Attorneys for Plaintiff

By s/ Arthur W. Harrigan, Jr.  
Arthur W. Harrigan, Jr.  
Tyler L. Farmer  
Harrigan Leyh Farmer & Thomsen LLP  
999 Third Avenue, Ste. 4400  
Seattle, WA 98104  
Telephone: (206) 623-1700  
Email: [arthurh@harriganleyh.com](mailto:arthurh@harriganleyh.com)  
[tylerf@harriganleyh.com](mailto:tylerf@harriganleyh.com)

MCNAUL EBEL NAWROT & HELGREN PLLC  
Attorneys for Defendant Charles Cobbs

By s/ Jehiel I. Baer  
Malaika M. Eaton  
Jehiel I. Baer  
McNaul Ebel Nawrot & Helgren PLLC  
600 University Street, Ste. 2700  
Seattle, WA 98101  
Telephone (206) 467-1816  
Email: [meaton@mcnaul.com](mailto:meaton@mcnaul.com)  
[jbaer@mcnaul.com](mailto:jbaer@mcnaul.com)

STIPULATED MOTION EXTENDING INITIAL  
SCHEDULING DEADLINES - 4  
CASE NO. 2:18-cv-00537-JLR

SUMMIT LAW GROUP PLLC  
315 FIFTH AVENUE SOUTH, SUITE 1000  
SEATTLE, WASHINGTON 98104-2682  
Telephone: (206) 676-7000  
Fax: (206) 676-7001

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

***Attorneys for Plaintiff***

Arthur W. Harrigan, Jr.  
Tyler L. Farmer  
Harrigan Leyh Farmer & Thomsen LLP  
999 Third Avenue, Ste. 4400  
Seattle, WA 98104  
Email: [arthurh@harriganleyh.com](mailto:arthurh@harriganleyh.com)  
[tylerf@harriganleyh.com](mailto:tylerf@harriganleyh.com)

***Attorneys for Plaintiff***

Irwin H. Schwartz  
Law Offices of Irwin H. Schwartz  
999 Third Avenue, Ste. 4400  
Seattle, WA 98104  
Email: [irwin@ihschwartz.com](mailto:irwin@ihschwartz.com)

***Attorneys for Defendant Charles Cobbs***

Malaika M. Eaton  
Jehiel I. Baer  
McNaul Ebel Nawrot & Helgren PLLC  
600 University Street, Ste. 2700  
Seattle, WA 98101  
Email: [meaton@mcnaul.com](mailto:meaton@mcnaul.com)  
[jbaer@mcnaul.com](mailto:jbaer@mcnaul.com)

DATED this 14<sup>th</sup> day of May, 2018.

s/ Katie Angelikis

Katie Angelikis